

**PAUL PADDALAW, PLLC**  
4560 South Decatur Boulevard, Suite 300  
Las Vegas, Nevada 89103  
Tele: (702) 366-1888 • Fax (702) 366-1940

PAUL S. PADDALAW, ESQ.  
Nevada Bar No. 10417  
Email: psp@paulpaddalaw.com  
**PAUL PADDALAW, PLLC**  
4560 S. Decatur Boulevard, Ste. 300  
Las Vegas, Nevada 89103  
Tele: (702) 366-1888  
  
Attorney for Plaintiff Rebecca Caver

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

REBECCA CAVER, an individual,

Plaintiff,

vs.

CARRIAGE FUNERAL HOLDINGS, INC., a  
foreign corporation, d/b/a CARRIAGE  
SERVICES OF NEVADA, INC., a foreign  
corporation, d/b/a CARRIAGE SERVICES,  
INC. d/b/a BUNKERS MORTUARY;  
RICHARD HANSEN, an individual; DOES 1  
through 10, inclusive; ROE  
CORPORATIONS/ENTITIES 1 through 10,  
inclusive;

Defendants.

Case No.: 2:20-cv-01912-JCM-VCF

**STIPULATION TO CONTINUE  
EARLY NEUTRAL EVALUATION  
SESSION (FIRST REQUEST)**

**(Expedited Review Requested)**

Plaintiff, Rebecca Caver, through her counsel of record, Paul S. Padda, of Paul Padda Law, and Defendants Carriage Funeral Holdings, Inc., d/b/a Carriage Services of Nevada, Inc., d/b/a Carriage Services, Inc. d/b/a Bunkers Mortuary, hereby stipulate and agree to continue the Early Neutral Evaluation (“ENE”) session currently scheduled for February 10, 2021 before United States Magistrate Judge Daniel J. Albregts. *See* ECF No. 14. This is the parties’ first request seeking a continuance of the ENE session. For the reasons set forth below, the parties respectfully request that the Court approve this stipulation and schedule the ENE for a date

**PAUL PADDALAW, PLLC**  
 4560 South Decatur Boulevard, Suite 300  
 Las Vegas, Nevada 89103  
 Tele: (702) 366-1888 • Fax (702) 366-1940

convenient for the Court but no earlier than March 15, 2021. In support of this stipulation, the parties represent the following:

1. Counsel for Plaintiff is required to be out of town next Wednesday (February 10, 2021) due to a time sensitive matter pertaining to another client. As a result, he will be required to leave Las Vegas on Monday (February 8, 2021). Counsel for Plaintiff only learned this today from his other client who brought to his attention a matter of an emergency nature and requesting his assistance. Counsel for Plaintiff immediately contacted Defendants' counsel and notified them of this fact and requested that they agree to this stipulation.

2. Counsel for Defendants do not oppose a continuance of the ENE.

3. The parties respectfully request the Court give this matter expedited consideration and approve this stipulation for a continuance of the ENE to a date convenient for the Court but no earlier than March 15, 2021. The parties propose the following 5 alternative dates for the ENE:

March 17, 2021 (Wednesday)

March 18, 2021 (Thursday)

March 19, 2021 (Friday)

March 25, 2021 (Thursday)

March 26, 2021 (Friday)

. . .

. . .

. . .

. . .

. . .

4. Counsel for Plaintiff apologizes to the Court and opposing counsel for any inconvenience occasioned by this request for continuance.

Respectfully Submitted,

/s/ Brian L. Bradford

/s/ Paul S. Padda

\_\_\_\_\_  
Scott M. Mahoney, Esq.  
Brian L. Bradford, Esq.  
FISHER & PHILLIPS, LLP  
300 South Fourth Street, Suite 1500  
Las Vegas, Nevada 89101  
Tele: (702) 252-3131

\_\_\_\_\_  
Paul S. Padda, Esq.  
PAUL PADDALAW, PLLC  
4560 South Decatur Blvd, Suite 300  
Las Vegas, Nevada 89103  
Tele: (702) 366-1888

Attorney for Plaintiff

Attorneys for Defendants

Dated: February 5, 2021

Dated: February 5, 2021

**ORDER**

**IT IS SO ORDERED.** The Early Neutral Evaluation scheduled for February 10, 2021 is VACATED and **RESET** for **Thursday, March 25, 2021 at 10:00 a.m.** via video conference. IT IS FURTHER ORDERED that any revised or supplemental confidential evaluation statements are due by Noon on **Thursday, March 18, 2021.** All other provisions of the Court's Order (ECF No. 14) remain in effect.

DATED this 5th day of February, 2021.



\_\_\_\_\_  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

**PAUL PADDALAW, PLLC**  
4560 South Decatur Boulevard, Suite 300  
Las Vegas, Nevada 89103  
Tele: (702) 366-1888 • Fax (702) 366-1940